

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
INVACARE CORPORATION, <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 23-90068 (CML)
Reorganized Debtors.	)	(Jointly Administered)
	)	<b>Re: Docket No. 725</b>

**STIPULATION RESOLVING CLAIM OF GEORGE PFEIFER [CLAIM NO. 10032]**

Invacare Corporation (“Invacare”), one of the above-captioned reorganized debtors and debtors in possession (the “Reorganized Debtors”) and George Pfeifer (“Pfeifer” and together with Invacare, the “Parties”) hereby stipulate and agree as follows (this “Stipulation”):

**WHEREAS**, on January 31, 2023, the Reorganized Debtors filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101-1532, in the Bankruptcy Court for the Southern District of Texas;

**WHEREAS**, on February 20, 2023, Pfeifer filed proof of claim no. 10032 (the “Claim”) against the Company, asserting an unsecured claim in the amount of \$485,000;

**WHEREAS**, on February 1, 2024, the Reorganized Debtors filed *Invacare Corporation’s Objection to Proof of Claim No. 10032 Filed by George Pfeifer* [Docket No. 725] (the “Objection”), objecting to the Claim;

**WHEREAS**, the Parties desire to enter into this Stipulation to resolve the Claim.

**NOW, THEREFORE**, it is hereby stipulated and agreed to by and among the Parties as follows:

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Invacare Corporation (0965); Freedom Designs, Inc. (4857); and Adaptive Switch Laboratories, Inc. (6470). The corporate headquarters and the mailing address for the Debtors is 1 Invacare Way, Elyria, Ohio 44035.

1. The Claim is hereby reduced to an unsecured claim in the amount of \$360,000.
2. The Objection is withdrawn.
3. The Reorganized Debtors' claims agent, Epiq Corporate Restructuring, LLC, is authorized and directed to modify the official claims register to comport with this Stipulation.
4. The terms and conditions of this Stipulation shall be immediately effective and enforceable upon its entry.
5. The Court retains sole and exclusive jurisdiction to enforce the provisions of this Stipulation.

Houston, Texas

Dated: March 6, 2024

/s/ Nicholas M. Miller

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*/s/ Michael D. Shaffer*

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